UNITED ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Conesville Generating Station
EPA ID No.:	OHD000816686
ADDRESS:	47201 CR 273 Conesville, Ohio 43811
DATE OF INSPECTION:	August 11, 2010
EPA INSPECTOR:	Derrick Samaranski, LCD, RCRA, CS2

PREPARED BY: Derrick Samaranski — **Derrick Samaranski** — 09/24/2010 — **Date Completed**

ACCEPTED BY: [signature] — **Michael Beedle, Acting Chief, Compliance Section 2** — 9/24/2010 — **Date**

Purpose of Inspection

This inspection was an evaluation of the Conesville Generating Station (Conesville) compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) and the code of Federal Regulations (CFR). The inspection was an EPA lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Derrick Samaranski, U.S. EPA
John Rochotte, Ohio EPA

Site Representatives:

Angela Larrick, Environmental and Chemistry Lab Team Leader
Ryan Forbes, Plant Chemist
Gigi Hammond, Plant Environmental Coordinator
Scott Drexel, Performance and Industrial Hygiene
Earl Duck, Process Supervisor

Introduction

We arrived at the location of the Conesville facility at 10:35 AM, signed-in at the guard station, and asked the security officer to inform Consville environmental staff of our arrival. The security officer informed us that Ms. Hammond was at another location and that Mr. Duck would arrive to meet us.

During the opening conference, I introduced myself, presented my official credentials, and explained the purpose of our visit. I also asked Conesville facility staff for a description of the Consville power generation operations, and hazardous and solid waste streams generated by the facility.

Site Description

Conesville is a coal-fired electric power generation plant constructed in 1957. Coal arrives at the plant by truck or rail and is unloaded by the coal supplier. The facility generates 1,800 mega watts of power from four generator/boiler units 3, 4, 5, and 6. There were six total generator/boiler units with two of the oldest units 1 and 2 retired, and unit 3 retiring in the near future. Unit 4 had been recently upgraded with a new flue gas desulfurization (FGD) which included a scrubber retrofitted to a Jet Bubble Reactor (JBR), new waste water treatment plant, and selective catalytic reduction (SCR) system to control combustion product emissions. Units 5 and 6 have older emission control technology that has been originally installed in the late 1970's. There are also three smaller start-up units each with a capacity of 2.7 mega watts that use #2 fuel oil.

At the time of the inspection Consville employed 360 employees at the site. Consville typically operates as a small quantity generator of hazardous waste, however at times it becomes an episodic large quantity generator during construction and facility maintenance projects.

Consville bottom and fly ash ponds to accumulate wastes generated from the combustion of coal. The ponds are located north east of the plant. Bottom ash and fly ash are RCRA exempt waste streams. Hazardous wastes generated Consville plant include: paint waste/personal protective equipment (PPE) (F003, F005, D007, D008) from paint removal, lab wastes (D001, D002, D003, U160), monitoring equipment waste (D009), equipment maintenance (D001, D002), and equipment cleaning (D007). In addition to coal combustion wastes and hazardous wastes Consville also generates: used oil which is burned on-site, used fluorescent lamps, used batteries, empty aerosol cans, waste waters, sludges, and spent solvent from parts washers.

The Consville facility used process knowledge, Material Data Safety Sheets (MSDS), and analytical results to characterize its hazardous waste streams. Table 1 lists Conesville's hazardous waste streams and their approximate generation rates:

Waste Type	Potential Hazardous Constituent/Characteristic	EPA Waste Code	Generation Rate[1]
Paint Waste	Acetone, Chromium, Lead	F003, F005, D007, D008	403 lbs/month
Mercury Waste	Mercury	D009	Very Small
Boiler Clean-Out	Chromium	D007	Every Five Years[2]
Lab Waste	Ignitability, Reactivity, Methyl Ethyl Ketone Peroxide	D001, D003, U160	21 lbs/month
Equipment Maintenance	Corrosivity, Acetone	D002, F003	70 lbs/month

Table 1: Wastes Generated at Conesville Facility

Site Tour

The site walk-through of the Conesville facility operations started at 2:31 PM, and began with a visit to the facility's universal and hazardous waste accumulation areas. During our visit to the facility's universal waste accumulation area I observed four containers accumulating used batteries, broken lamps, high intensity discharge (HID) bulbs, and used lamps. All of the universal waste containers have been closed, properly labeled, and dated with accumulation start dates of 04/10/10, 08/03/10, 08/03/10, and 08/03/10 respectively. In the hazardous waste storage area Consville was accumulating: personal protective equipment contained with hazardous waste containers in designated bays in plastic bags, one mercury switch, and a container of lab waste.

[1] Average generation rates determined from 2010 Hazardous Waste Manifests
[2] Treated on-site in Totally Enclosed Treatment Unit and Co-incinerated with Coal in Unit #5

All of the containers were labeled as "Hazardous Waste," closed, and dated with accumulation start dates. The oldest accumulation start date was on lab waste and it was 07/06/2010. Emergency equipment was located in the accumulation area.

After visiting the universal and hazardous waste accumulation areas, we visited Consville's main used oil tank, maintenance area, and on-site lab. The 11,280 gallon used oil tank is located in an outdoor yard and accumulates used oils generated throughout the facility. The tank was labeled as used oil. Conesville has four used oil tanks and offers its used oil to Crystal Clean or burns some of it on-site. In the maintenance area, I observed a 55-gallon aerosol can crushing unit which was accumulating liquids from the cans. The aerosols can crushing unit serves as a satellite accumulation container and it was not labeled as "Hazardous Waste." Conesville also operates a cutting table and salt blaster unit in the maintenance area. According to Ms. Hammond the wastes from the cutting table are analyzed once a year and are determined to be non-hazardous. No wastes from the salt blaster have been generated or disposed. During our visit to the facility lab, I observed accumulation of used Nessler's reagent for ammonia testing being accumulated in a 5-gallon container. During our visit to the lab we met and spoke briefly with Mr. Westfall.

Next, we visited two tanks were Consville accumulates boiler chemical cleaning waste which is generated once every five years during boiler clean-outs. Consville treats the boiler chemical waste on-site by diluting it to meet Toxic Characteristic Leaching Procedure (TCLP) limit for chromium (D007) and then incinerates the waste in boilers #5 and #6.

The site walk-through ended with visits to the FGD sludge treatment plant, ash ponds, and waste water treatment plant. Wastes from the FGD sludge treatment plant are sent to facility's landfill which is located about 2 miles north east of the facility. Bottom ash pond is dredged every 3-5 years to remove 100,000 lbs of material out of which 50% is recycled as blasting grit or sold to counties, and rest landfilled. We visited the Conesville landfill after the records review and observed that the facility was in process of expanding its landfill capacity. The site walk-through ended at 4:30 PM.

Record Review

For the records review at the Conesville facility I requested to see: manifest records for the last two years of operation (2010, and 2009), waste analysis determinations for waste streams generated at the facility, Land Disposal Restriction (LDR) forms, used oil shipment documents, weekly inspections of the hazardous waste storage area, and universal waste shipment documents.

First, I reviewed Conesville's hazardous waste manifests. In 2009 Consville generated 5,460,405 lbs of hazardous waste out of which 39,405 lbs were offered for off-site disposal, and 5,421,000 lbs were treated on-site and burned in boiler #5. The large hazardous waste generation in 2009 resulted from the periodic chemical boiler clean-out which occurs every five years. In

2009 Conesville operated as large quantity generator of hazardous waste. In 2010 Conesville made 15 off-site shipments of hazardous wastes that included: paint waste, corrosive wastes, lab wastes, mercury, and barium waste. The paint and corrosive wastes were offered for disposal to Perto Chem (MID980615298), lab wastes to Veolia (OHD09394529), and mercury waste to HTK Group (MOR000504456). LDRs for each waste were attached to the hazardous waste manifests.

Next, I reviewed a sample of the facility's non-hazardous waste shipment documents. In 2009 Conesville offered its oily water, contained soil/fuel oil and water, insulation, and aluminum oxide for disposal to Suburban South Landfill in Glenford, Ohio. Sandblast grit and contaminated fly ash were offered to Coshocton Landfill. In 2010 used oil, oily water, and used antifreeze were offered for disposal to Crystal Clean (OHD000616666).

After reviewing non-hazardous waste shipment documents, I reviewed Conesville's last two annual hazardous waste reports 2009 and 2006 which were submitted to Ohio EPA on 02/23/2010 and 02/22/2007 respectively. During 2009 and 2006 Consville operated as a large quantity generator of hazardous waste.

Next, I reviewed weekly inspection records, and employee training records. I reviewed the weekly inspection records for the 180-day hazardous waste storage area for period starting in August 2009 and ending August 2010. Conesville personnel conduct weekly inspections of the hazardous and universal waste accumulation areas, and used oil containers and tanks. The last employee training was offered on 08/18/2009.

For the waste determination records I reviewed a sample of analytical results for: blast grit (non-hazardous), JBR waste aluminum oxide (non-hazardous), laundry waste (non-hazardous), unit #4 chemical cleaning waste (D007), and chemical cleaning waste in storage tank 1and 2 (non-hazardous) and after it has been treated on-site.

Next, I reviewed letters to Ohio EPA regarding on-site treatment and disposal of boiler chemical clean-out, MSDS for Trona material (non-hazardous), and specification for an on-site used oil burner.

Closing Conference

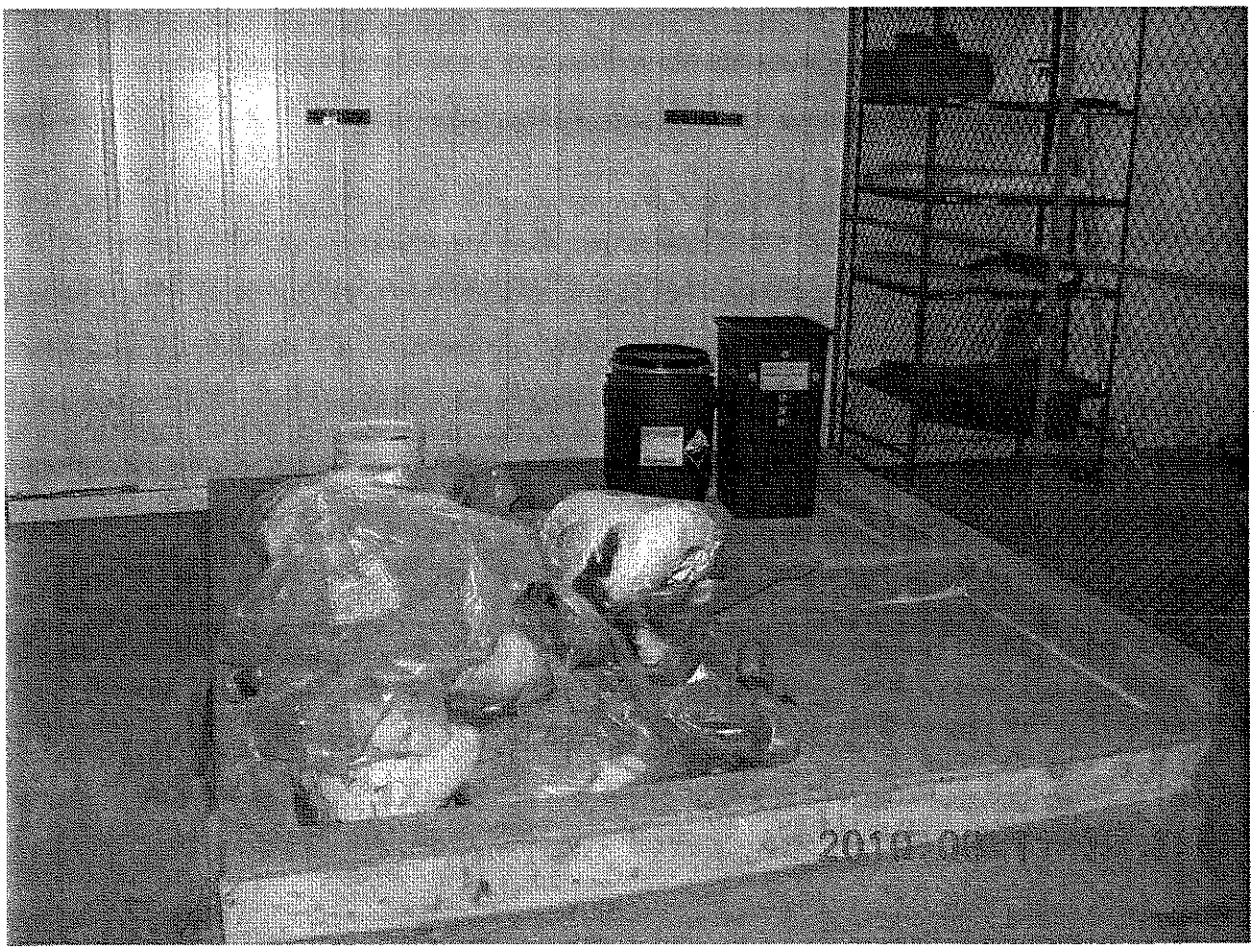
During the closing conference I discussed potential issues of concern observed during the inspection. The inspection of the facility ended at 6:45PM.

Attachments

A. Photographs
B. Checklist
C. List of Documents Copied During Inspection

ATTACHMENT A
Photographs

Conesville Generating Station
OHD000816686

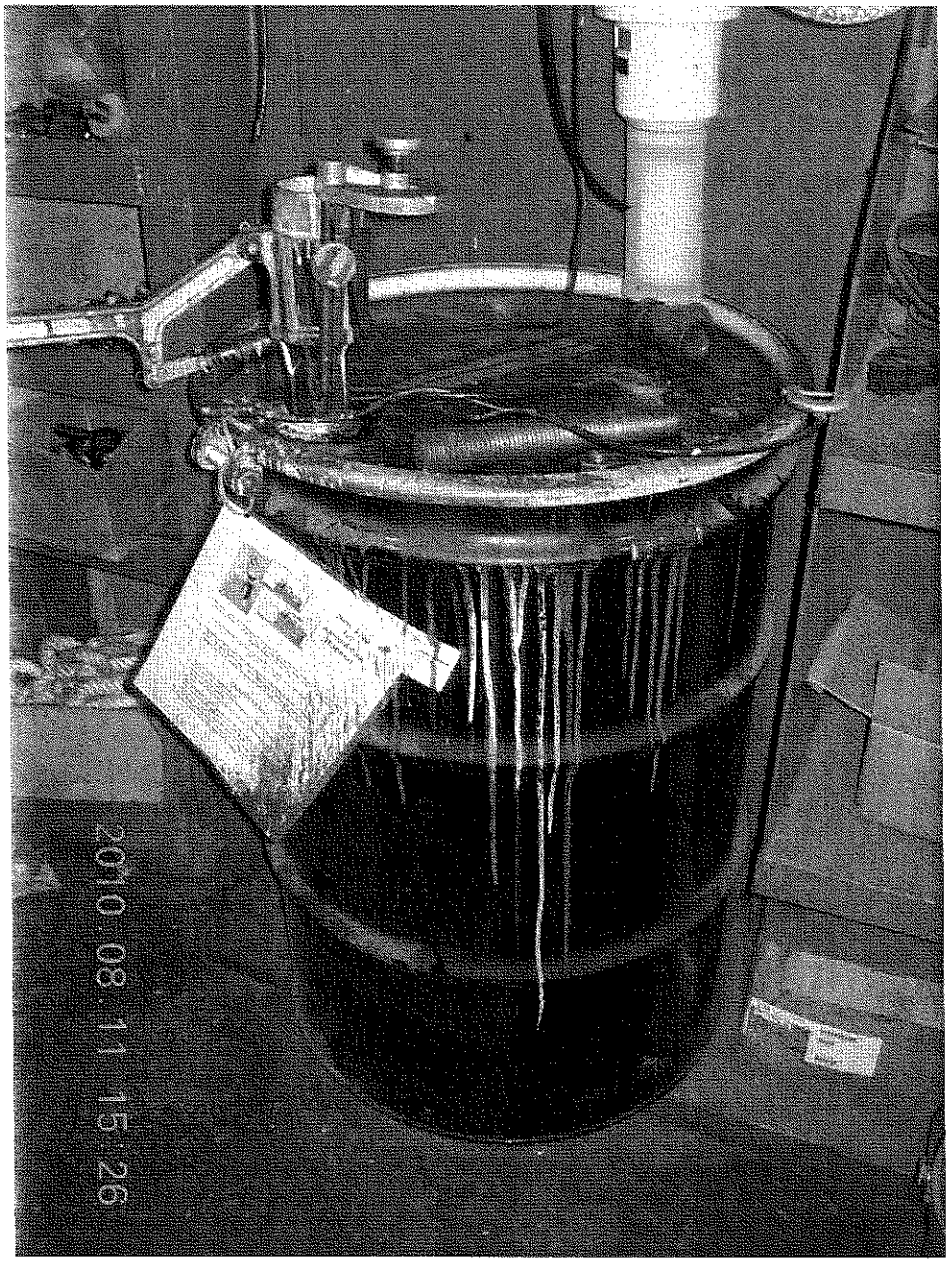


Photograph Number: 1

Photographer: Derrick Samaranski

Photograph Description: Hazardous wastes accumulated in Conesville's 180-day hazardous waste accumulation area.

Conesville Generating Station
OHD000816686



Photograph Number: 2

Photographer: Derrick Samaranski

Photograph Description: Unlabeled 55-gallon container accumulating aerosol wastes in the facility's maintenance area.

ATTACHMENT C
Documents Copied

Document	Date
Copies of 2010 Hazardous Waste Manifests	08/11/2010
Copies of Conesville Sample Waste Determinations	08/11/2010
Copies of TCLP Results of Boiler Cleaning Solutions	08/11/2010
Copy of a Sample Weekly Inspection Log	08/11/2010
Copies of Sample LDRs	08/11/2010
Copy of the 2009 Annual Report	08/11/2010
Copy of MSDS for Trona	08/11/2010
Copies of Non-Hazardous Waste Shipment Documents	08/11/2010
Facility Evacuation Diagram	08/11/2010

SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒ No ☐ N/A ☐
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes ☒ No ☐ N/A ☐
3.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes ☐ No ☒ N/A ☐
4.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes ☐ No ☒ N/A ☐
5.	Does the generator accumulate hazardous waste?	Yes ☒ No ☐ N/A ☐
NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.		
6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes ☐ No ☒ N/A ☐
NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]		
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes ☐ No ☒ N/A ☐
NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.		
8.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☒ No ☐ N/A ☐
b.	Tank that meets 3745-66-101?	Yes ☐ No ☐ N/A ☒
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒
NOTE: Complete appropriate checklist for each unit.		
NOTE: If waste is treated to meet LDRs, use LDR checklist.		

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes ☐ No ☐ N/A ☒
a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes ☐ No ☐ N/A ☒
b.	Is the transport vehicle owned and operated by the reclaimer?	Yes ☐ No ☐ N/A ☒

	c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes ☐ No ☐ N/A ☒
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.			
11.		Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]			
12.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
13.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
14.		Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes ☐ No ☐ N/A ☒
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.			
15.		If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes ☐ No ☐ N/A ☒
16.		Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PREPAREDNESS AND PREVENTION			
17.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes ☒ No ☐ N/A ☐
18.		Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a.	Name and telephone number of emergency coordinator? Contingency Plan	Yes ☒ No ☐ N/A ☐
	b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes ☒ No ☐ N/A ☐
	c.	Telephone number of local fire department?	Yes ☒ No ☐ N/A ☐
19.		Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes ☒ No ☐ N/A ☐
20.		Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes ☐ No ☐ N/A ☒
21.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes ☒ No ☐ N/A ☐
22.		Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
	a.	Internal Alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐

	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☐ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes ☒ No ☐ N/A ☐
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]*	Yes ☒ No ☐ N/A ☐
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (*unless not required under OAC 3745-65-32*)? [3745-65-34(B)]	Yes ☐ No ☐ N/A ☒
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☒
SATELLITE ACCUMULATION AREA REQUIREMENTS			
29.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☒ N/A ☐
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes ☐ No ☒ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS		
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes ☒ No ☐ N/A ☐

32.	Is the accumulation date on each container? [3745-52-34(D)(4)]		Yes ☒ No ☐ N/A ☐
33.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets and photograph the area.			
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.		Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☒
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☒
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
PRE-TRANSPORT REQUIREMENTS			
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes ☒ No ☐ N/A ☐
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☒ No ☐ N/A ☐
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☒ No ☐ N/A ☐

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☒ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☒ No ☐ N/A ☐

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☒ No ☐ N/A ☐
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☒ No ☐ N/A ☐
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.		Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes ☒ No ☐ N/A ☐
12.		If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.		Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes ☐ No ☐ N/A ☒
14.		Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes ☐ No ☐ N/A ☒
15.		Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☒ No___ N/A ___RMK#___

2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] — Yes ❑ No X N/A ___RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] — Yes ___ No ❑ N/A X RMK# 1

4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] — Yes ___ No ❑ N/A X RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes___ No___ N/A X RMK#___

   b. Mix battery types in one container? — Yes___ No___ N/A X RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No___ N/A X RMK#___

   d. Regenerated used batteries? — Yes___ No___ N/A X RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No___ N/A X RMK#___

   f. Remove batteries from consumer products? — Yes___ No___ N/A X RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No___ N/A X RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] — Yes ❑ No___ N/A X RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] — Yes ___ No ❑ N/A X RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] — Yes ___ No ❑ N/A X RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] — Yes ___ No ❑ N/A X RMK#___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] — Yes ___ No ❑ N/A X RMK#___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] — Yes X No ❑ N/A ___RMK#___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] — Yes X No ❑ N/A ___RMK#___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] — Yes X No ❑ N/A ___RMK#___

NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]**. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes X No___ N/A ___RMK#___

    a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No ☐ N/A X RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

12. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] Yes X No ☐ N/A ___RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes X No___ N/A ___RMK#___

    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes___ No___ N/A X RMK#___

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes___ No___ N/A X RMK#___

    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes___ No___ N/A X RMK#___

    e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes___ No___ N/A X RMK#___

    f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes X No___ N/A ___RMK#___

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] — Yes ☒ No ☐ N/A ___ RMK#___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___ No ☐ N/A ☒ RMK#___

15. Is the material released characterized? [3745-273-17(B)] — Yes ___ No ☐ N/A ☒ RMK#___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] — Yes ___ No ☐ N/A ☒ RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports waste, then they must comply with the Universal Waste transporter requirements.***

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] — Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***SQUWHs are prohibited to send waste to any other facility.***

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] — Yes ☒ No ☐ N/A ___ RMK#___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] — Yes ☒ No ☐ N/A ___ RMK#___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes___ No___ N/A ☒ RMK#___

    b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes___ No___ N/A ☒ RMK#___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No ☐ N/A X RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes___ No___ N/A X RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes___ No___ N/A X RMK#___

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No ☐ N/A X RMK#___

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No ☐ N/A X RMK#___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes___ No ✓ N/A ___RMK#___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ☐ N/A ✓ RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ☐ N/A ✓ RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ☐ N/A ✓ RMK#___

REMARKS

Not inspected, no batteries on-site at the time of visit.